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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
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10 YINTAO YU, an individual,

11 Plaintiff,

12 vs.

13 BYTEDANCE INC., a Delaware corporation;
14 SHUYI (SELENE) GAO, an individual,

15 Defendants.

16 BYTEDANCE INC., a Delaware
17 Corporation,

18 Counter-Claimant

19 vs.

20 YINTAO YU, an individual,

21 Counter-Defendant.
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Case No. 3:23-cv-04910-SI

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION FOR SANCTIONS
AGAINST CHARLES JUNG AND JAIME
DORENBAUM**

[Originally San Francisco Superior Court
No. CGC-23-608845]

State Action Filed: September 5, 2023
Removal Date: September 25, 2023
Trial Date: November 18, 2024

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendants ByteDance Inc. and Shuyi (Selene) Gao (collectively, “Defendants”) did move this Court for an Order granting sanctions against Charles Jung and Jaime Dorenbaum under either 28 U.S.C. § 1927, this Court’s inherent authority, or both (the “Motion”).

Having considered Defendants’ Motion, and for good cause shown, the Court GRANTS the Motion and orders sanctions against Charles Jung and Jaime Dorenbaum.

Based on the files and records before the Court and for good cause shown, IT IS HEREBY ORDERED THAT

Charles Jung and Jaime Dorenbaum (collectively, “Yu’s Counsel”) are hereby sanctioned \$6,280,077.38 pursuant to 28 U.S.C. § 1927 and this Court’s inherent powers because they unreasonably and vexatiously multiplied the proceedings in this case by, amongst other things: (1) failing to conduct any investigation or perform any due diligence regarding the anonymous declarant; (2) making false representations and/or reckless misrepresentations—some under penalty of perjury—to this Court including but not limited to those regarding the anonymous declarant; (3) engaging in tactical maneuvers designed to avoid the arbitration process to which their client Yintao (Roger) Yu expressly consented during his employment with BDI and ultimately voluntarily submitted his claims; and (4) attempting to excuse their misconduct with more misrepresentations rather than correct their meritless positions.

IT IS SO ORDERED.

Dated: _____, 2025

HON. SUSAN ILLSTON
DISTRICT COURT JUDGE